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Docket Management System
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-0001

Docket No. FAA-2003-16685
Comments submitted electronically to: <http://dms.dot.gov>

Dear Sir or Madam:

The National Agricultural Aviation Association (NAAA) wishes to submit the following comments in response to the Federal Register Notice of Proposed Rulemaking published in Vol. 69, No. 13 on Wednesday, January 21, 2004. The title is Establishment of Organization Designation Authorization Procedures; Proposed Rule.

The NAAA agrees with the Federal Aviation Administration (FAA) that an organization like the NAAA has expertise that could benefit the FAA in the certification of agricultural aviation (aerial application) operators under 14 CFR Part 137. The FAA operations inspectors currently performing this function generally do not have experience in this segment of general aviation.

The NAAA also agrees that allowing the International Council of Air Shows to participate in the Aerobatic Competency Evaluator Program and the Experimental Aircraft Association to assist in the certification of pilots and crews under the National Designated Pilot and Designated Flight Engineer Examiners Program has been beneficial to both the aviation community and the FAA. Likewise, we feel that our service could also be beneficial to the aviation industry.

We have studied the NPRM and have found some areas of concern to us. It is our conclusion that the expense of setting up and maintaining an ODA program is more costly than we can afford to provide as a service to our industry. Likewise, based on the small number of Part 137 certificates that are issued each year, user charges to the applicant would be exorbitant if we attempted to recover the costs involved in certification. According to the requirements of the ODA, in addition to the initial set-up of the program, we would have to assign personnel to over-see the program, process the

documentation, administer the knowledge and skill tests, and inspect the aircraft and facility. In order to accomplish the required tasks, we would need to have trained personnel available nation-wide to meet the needs of applicants for the certificate. In many cases, it would require more than one person since they must have experience and expertise in both operations and airworthiness fields at a minimum.

In conclusion, the NAAA feels that the ODA program could be good for our industry but at present we cannot financially support it. Therefore, it is our opinion that the certification of Part 137 operators should continue to be done by the FAA. If the decision is made that the FAA is unable to perform the certification, we would oppose any attempt at certification by a group that lacks the knowledge and desire for high standards of professionalism required of aerial application operators. The NAAA will continue to offer assistance to the FAA to better understand our industry. In the past we have served on the JSIT panel and are currently working with the SAGA program.

Andrew D. Moore
Executive Director